

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

Joshua Winer,

Plaintiff,

v.

Umaymah Mohammad, AJP  
Educational Foundation, Inc. A/K/A  
American Muslims For Palestine,  
WESPAC Foundation, Inc., Sean Eren  
as the representative of National  
Students for Justice in Palestine,  
Doctors Against Genocide Society, Cair-  
Nga Inc. A/K/A/ CAIR-Georgia, CAIR  
Foundation Inc., A/K/A Council on  
Islamic Relations or CAIR, Rupa  
Marya, Ibrahim Jouja as representative  
of Emory Students for Justice in  
Palestine,

Defendants.

CIVIL ACTION FILE

No. 1:25-cv-02329

**MOTION TO STAY BRIEFING OF PENDING MOTIONS TO DISMISS  
UNTIL RULING ON PLAINTIFF’S MOTION FOR LEAVE TO FILE  
SECOND AMENDED COMPLAINT**

Plaintiff Joshua Winer (“Plaintiff”) respectfully moves under Federal Rule of Civil Procedure 6(b)(1)(A) for an order staying briefing on the pending motions to dismiss the First Amended Complaint until the Court has ruled on Plaintiff’s Motion for Leave to File a Second Amended Complaint.

In support, Plaintiff shows the Court as follows:

1. Plaintiff filed his original complaint on April 25, 2025.

2. Plaintiff filed his First Amended Complaint on May 20, 2025, adding a claim under 42 U.S.C. § 1985(3).

3. Except for Defendant Sean Eren, representative of National Students for Justice in Palestine, who will be served by publication pursuant to the Court's Order (Dkt. 118), each of the remaining eight Defendants has appeared and filed a motion to dismiss the First Amended Complaint. *See* Dkt. Nos. 41, 63, 83, 94, 95, 96, 97, 101. To date, Plaintiff has responded to two of the motions. *See* Dkt. Nos. 60, 91. The deadline to respond to the remaining six Defendants' motions is, by court order, November 7, 2025. *See* Dkt. Nos. 66, 90, 100, 111.

4. In the process of responding to the various motions to dismiss, Plaintiff elected to seek leave to file a Second Amended Complaint under Federal Rule of Civil Procedure 15(a)(2). Defendants did not consent to this amendment. Thus, Plaintiff filed a motion for leave to amend on September 15, 2025. *See* Dkt. 109.

5. Should leave be granted, Plaintiff consents to re-briefing or supplemental briefing on the motions to dismiss, as appropriate.

6. Staying briefing on the pending motions to dismiss will promote judicial economy and conserve the parties' resources while this Court considers the Motion for Leave to Amend (dkt. 109).

7. While Plaintiff has asked for and received extensions on this briefing in the past, this is Plaintiff's first request for a stay of briefing. This request is made in good faith and not for the purpose of delay.

8. A proposed Order is attached for the Court's consideration.

Respectfully submitted this 3<sup>rd</sup> day of November, 2025.

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**CERTIFICATE OF COMPLIANCE**

By signature below, counsel certifies that the foregoing was prepared in Century Schoolbook, 13-point font, in compliance with Local Rule 5.1(C).

/s/ Miles C. Skedsvold  
Miles C. Skedsvold

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the within and foregoing **CONSENT MOTION FOR EXTENSION OF TIME TO FILE PLAINTIFF'S RESPONSE TO DEFENDANT AJP EDUCATIONAL FOUNDATION'S MOTIONS TO DISMISS** with the Clerk of Court using the CM/ECF electronic filing system, which suffices for service on all counsel of record who have entered an appearance in the case under L.R. 5.1(A)(3).

This 3<sup>rd</sup> day of November, 2025.

/s/ Miles C. Skedsvold  
Miles C. Skedsvold